



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-3628

April 1, 2014

**Via E-Mail**

David T. Zhang, Esq.  
Kirkland & Ellis  
26<sup>th</sup> Floor, Gloucester Tower, The Landmark  
15 Queen's Road, Central  
Hong Kong

**Re: Amended Schedule 13E-3  
Filed March 28, 2014 by WSP Holdings Limited, Wuxi Heavy  
Industries, Ltd., WHI Acquisitions, Ltd., Mr. Longhua Piao, Expert  
Master Holdings Limited, UMW China Ventures (L) Ltd., UMW  
Petropipe (L) Ltd., UMW Holdings Berhad, Mr. Sergey  
Alexandrovich Borovskiy, and General Transactions, Inc.  
File No. 005-83618**

Dear Mr. Zhang:

We have reviewed your filing and have the following comments.

**Proxy Statement**

**Reasons for the Merger and Recommendation of the Special Committee and Our Board  
of Directors, page 38**

1. We note that the Special Committee did not believe, on March 11, 2014, that there had been any material changes in the company's operations, performance or any projection or assumption used by Houlihan Lokey in issuing its fairness opinion in February 2013. Revise this section to disclose the basis for such conclusion. Disclose whether, among other developments in the past 12 months, the results of the company's operations in 2013 were similar to those it had obtained in 2012 and prior years, that the company's position in its industry remained the same in 2013, and that any changes in the company's industry and the economies in which the company operates did not affect the company.
2. We note that the company disposed of two subsidiaries in December 2013. We note that the sale of Liaoyang Seamless resulted in the future receipt of RMB50 million and the assumption of debt of RMB40 million by the subsidiary's buyer. Please revise your disclosure here to address these sales specifically. For example, did this future receipt of cash and assumption of debt affect the valuation of the company?

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3. Disclose whether or not the special committee considered requesting Houlihan Lokey to update its opinion and, if not, why.

Position of the Buyer Group, page 44

4. We note that the disclosure in this section has not changed despite the Buyer Group being conformed of new entities, apparently unaffiliated with the previous buyer group. Please revise your disclosure to state, if true, that the current Buyer Group conducted the same analyses and reached the same conclusions as the previous buyer group.

Please direct any questions to me at (202) 551-3619. You may also contact me via facsimile at (202) 772-9203. Please send all correspondence to us at the following ZIP code: 20549-3628.

Sincerely,

/s/ Daniel F. Duchovny  
Daniel F. Duchovny  
Special Counsel  
Office of Mergers and Acquisitions